

EXHIBIT G

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HTC'S CORPORATION'S DEPOSITION DESIGNATIONS

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(A) and the Eighth Amended Docket Control Order (D.I. 212), Defendant HTC Corporation (“Defendant”) hereby serves its affirmative designations of those witnesses whose testimony Defendant may present at trial by means of deposition for issues in which Defendant holds the burden of proof (e.g., invalidity).

Defendant serves these deposition designations subject to and without waiver of its motions *in limine*, motions to exclude certain evidence, *Daubert* motions, and challenges to experts. Defendant reserves the right to modify, amend, or supplement these designations in response to rulings by the Court (including on any motions). Defendant also reserves the right to present deposition testimony from any witness designated by Plaintiff for purposes of impeachment or during the examination of its expert witnesses.

DEPOSITION OF ROBERT L. MEYERS – DECEMBER 21, 2017				
HTC'S INITIAL DESIGNATIONS	SALAZAR'S OBJECTIONS	SALAZAR'S COUNTER-DESIGNATIONS	HTC'S OBJECTIONS TO SALAZAR'S COUNTER- DESIGNATIONS	COURT RULING
4:7-14		None	None	
5:11-17				
7:8-23				
8:20 – 9:1				
11:25 – 12:10				
17:12-20				
18:5-14				
22:11-23:5	401/402, S, VA, 602P, 602F			
23:17-19	401/402, S, VA, 602P, 602F			
24:13 – 25:5	401/402, S, VA, 602P, 602F			
31:20-25	401/402, S, VA, 602P, 602F			
32:5-8	401/402, S, VA, 602P, 602F			

DEPOSITION OF JOE ANDREW SALAZAR – DECEMBER 20, 2017				
HTC'S INITIAL DESIGNATIONS	SALAZAR'S OBJECTIONS	SALAZAR'S COUNTER-DESIGNATIONS	HTC'S OBJECTIONS TO SALAZAR'S COUNTER- DESIGNATIONS	COURT RULING
4:7-12		None	None	
8:6-10				
30:6-7				
30:15-18	LC			
30:20-23	LC			
30:25-31:4	LC			
42:6-7	602F, VA, 701, 702			
42:9	602F, VA, 701, 702			
43:5-6	602F, VA, 701, 702			
43:8-11	602F, VA, 701, 702			
55:2-3	602F, VA, 701, 702			
55:5-6	602F, VA, 701, 702			
62:19-63:2	602F, VA, 701, 702			
63:10-11	602F, VA, 701, 702			
63:14	602F, VA, 701, 702			
74:15-19	602F, VA, 701, 702			
74:23-75:10	602F, VA, 701, 702			
75:15-21	602F, VA, 701, 702			
94:12-15	602F, VA, 701, 702			
95:8-11	602F, VA, 701, 702			
95:20-96:18	602F, VA, 701, 702			
97:3-5	602F, VA, 701, 702			
97:7-10	LC			
100:10-17	LC			
100:21-24				
101:17-22				
110:24-111:2	LC, MIS, H, 602P, 602F			

DEPOSITION OF JOE ANDREW SALAZAR – DECEMBER 20, 2017				
HTC'S INITIAL DESIGNATIONS	SALAZAR'S OBJECTIONS	SALAZAR'S COUNTER-DESIGNATIONS	HTC'S OBJECTIONS TO SALAZAR'S COUNTER- DESIGNATIONS	COURT RULING
111:4-8	LC, MIS, H, 602P, 602F, PRIV			
111:11-20	LC, MIS, H, 602P, 602F, PRIV			
112:2-4	LC, MIS, H, 602P, 602F, PRIV			
112:6-7	LC, MIS, H, 602P, 602F, PRIV			

DEPOSITION OF SIVASUBRAMANIAN MUTHUKUMARASAMY – JANUARY 8, 2018				
SALAZAR'S INITIAL DESIGNATIONS	HTC'S OBJECTIONS	HTC'S COUNTER DESIGNATIONS	SALAZAR'S OBJECTIONS TO SALAZAR'S COUNTER- DESIGNATIONS	COURT RULING
		8:14-12:25	401/402, 602F, 602P, VA	
		13:20-18:8	401/402, 602F, 602P, VA, LC	
		20:5-7		
		20:11-13		
		20:20-23		
		27:2-3		
		27:5-20		
		28:5-11		
		28:13-16		

KEY	SALAZAR'S OBJECTIONS TO HTC'S REBUTTAL DEPOSITION DESIGNATIONS
106	Optional completeness required to put statement in proper context
401/402	Lacks relevance
403P	Prejudice outweighs relevance
403M	Evidence could mislead jury or confuse issues
403C	Cumulative evidence
408	Settlement communications
602F	Lacks proper foundation
602P	Witness lacks personal knowledge
701/702	Improper or unreliable opinion testimony
703	Inadmissible evidence disclosed as basis for expert opinion
802	Hearsay
805	Hearsay within hearsay
901	Lacks authenticity
MIL	Subject to motion in limine
ARG	Scope/Form: Argumentative
AF	Scope/Form: Assumes facts not in evidence
COM	Scope/Form: Compound
MIS	Scope/Form: Misquoting/mischaracterizing prior testimony
NAR	Scope/Form: Narrative
NR	Scope/Form: Non-responsive
LQ	Scope/Form: Leading question
S	Scope/Form: Speculation
LC	Scope/Form: Legal conclusion
PRIV	Scope/Form: Privileged
R	Scope/Form: Repetitive/asked and answered
IP	Scope/Form: Improper Impeachment
VA	Scope/Form: Vague/Ambiguous
ATTNY	Attorney objections, side-bar remarks or argument not removed
PER	Testimony by 30(b)(6) designee outside scope of noticed topics